

CADDO PARISH 501 TEXAS STREET, ROOM 103 SHREVEPORT, LA 71101-5408

PHONE: 318-226-6795 318-226-6780 FAX: 318-227-9080

JESSE JAMES

NUMBER: 591,172-A

VERSUS

FIRST JUDICIAL DISTRICT COURT

MRC RECEIVABLES CORP., MIDLAND FUNDING, LLC, PERFORMANCEONE FINANCIAL, INC. F/K/A ENCORE CAPITAL GROUP, INC. D.B.A MIDLAND CREDIT MANAGEMENT, INC., MIDLAND CREDIT MANAGEMENT, INC., EQUABLE ASCENT FINANCIAL, LLC, and CAVALRY PORTFOLIO SERVICES, LLC

CADDO PARISH, LOUISIANA

TO WHOM IT MAY CONCERN:

I, DIANNE L. HARMON, DEPUTY CLERK OF THE FIRST JUJDICIAL DISTRICT COURT, IN AND FOR THE PARISH OF CADDO, STATE OF LOUISIANA, HEREBY CERTIFY THAT THE ATTACHED COPIES ARE TRUE AND CORRECT COPIES OF THE ENTIRE ORIGINAL PROCEEDINGS FILED IN THE ABOVE STYLED CASE.

GIVEN UNDER MY HAND AND THE SEAL OF THIS OFFICE ON THIS THE 29TH DAY OF MARCH, 2016.

DIANNE L. HARMON DEPUTY CLERK

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JESSE JAMES

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NUMBER: $\vec{S}''//72 - f$ FIRST JUDICIAL DISTRICT COURT

MRC RECEIVABLES CORP., MIDLAND FUNDING, LLC, PERFORMANCEONE FINANCIAL, INC. F/K/A ENCORE CAPITAL GROUP, INC. D/B/A MIDLAND CREDIT MANAGEMENT, INC., MIDLAND CREDIT MANAGEMENT, INC., EQUABLE ASCENT FINANCIAL, LLC, and CAVALRY PORTFOLIO SERVICES, LLC

CADDO PARISH, LOUISIANA

PETITION

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PERFORMANCEONE FINANCIAL, INC. F/K/A ENCORE CAPITAL GROUP, INC. D/B/A MIDLAND CREDIT MANAGEMENT, INC., MIDLAND CREDIT MANAGEMENT, INC., and CAVALRY PORTFOLIO SERVICES, LLC, NOW INTO COURT, through undersigned counsel, JESSE JAMES, Plaintiff in the above entitled and captioned matter, who respectfully prays for Judgment of this Honorable Court against defendants, MRC RECEIVABLES CORP., MIDLAND FUNDING, LIC, jointly and severally, as set forth in the following Petition, as follows: ASCENT FINANCIAL, LLC, EQUABLE

z Z Plaintiff, JESSE JAMES, is a major domiciliary of Shreveport, Caddo Parish, Louisiana defendants. X. 0 a victim of repeated false credit reportings and collection activities by PGS ≌. and

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Made Defendants herein are:

MRC RECEIVABLES CORP., which may also hereinafter befeltetted to as "Wift

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Ğ served with process through its registered agent for service foreign corporation believed to be authorized to do and doing business in the State of 501 Louisiana Ave., Baton Rouge, Louisiana who may be Louisiana, and

Corporation Service Company, and process:

Louisiana, and who may be served with process through its registered agent for service of g FUNDING, LLC, which may also hereinafter be referred to as "Midland," Baton Rouge, Louisiana authorized to do and doing business in the State process: Corporation Service Company, 501 Louisiana Ave., foreign corporation believed to be MIDLAND 9

70802; and

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- referred to as "Midland," a foreign corporation believed to be authorized to do but doing PERFORMANCEONE FINANCIAL, INC. F/K/A ENCORE CAPITAL GROUP, INC. business in the State of Louisiana, and who will be served via the Louisiana Long-Arm D/B/A MIDLAND CREDIT MANAGEMENT, INC., which may also hereinafter be statute through its registered agent for service of process: Nick Manardi, 2040 Main Street, Suite 800A, Irvine, California 92614; $\overline{2}$
- as "Midland," a foreign corporation believed to be authorized to do but doing business in MIDLAND CREDIT MANAGEMENT, INC., which may also hereinafter be referred through its registered agent for service of process: Corporation Service Company, 501 the State of Louisiana, and who will be served via the Louisiana Long-Arm statute Louisiana Ave., Baton Rouge, Louisiana 70802; T
- through its registered agent for service of process: President/CEO, EQUABLE ASCENT EQUABLE ASCENT FINANCIAL, LLC, which may also hereinafter be referred to as "Equable," a foreign corporation believed to be authorized to do and doing business in President/CEO, EQUABLE ASCENT FINANCIAL, LLC, 1120 West Lake Cook Rd., the State of Louisiana, and who will be served via the Louisiana Long-Arm statute FINANCIAL, LLC, 160 North Franklin, 3rd Floor, Chicago, Illinois 60606; and Suite B, Buffalo Grove, Illinois 60089; and $\overline{\mathbb{Z}}$
- "Cavalry," a foreign corporation believed to be authorized to do and doing business in the CAVALRY PORTFOLIO SERVICES, LLC, which may also hereinafter be referred to as State of Louisiana, and who will be served via the Louisiana Long-Arm statute through its agent for service of process: President/CEO, CAVALRY PORTFOLIO SERVICES, LLC, 7 Skyline Dr., 3rd Floor, Hawthorne, New York 10532. Ξ

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Plaintiff respectfully asserts that this Honorable Court has subject matter jurisdiction in the Louisiana Long-Arm venue provision and plaintiff's damages were sustained in this Parish this case as a court of competent, concurrent jurisdiction. Venue is proper as this Parish under substantially, all of the underlying events took place in and caused impact and damage in this Parish and State. and,

against the Defendants sums representing statutory damages and punitive or exemplary damages in addition to actual or compensatory damages.

Plaintiff respectfully requests that this Honorable Court award in plaintiff's favor and

expenses and other costs of litigation and reasonable attorneys' fees incurred in this litigation. Plaintiff respectfully requests that this Honorable Court award plaintiff his litigation

Plaintiff is a consumer and a victim of improper collection activities and false credit reportings by defendants.

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furnishers/users/subscribers of and to credit information to the national credit reporting agencies, Defendants MRC, Equable, Cavalry, and Midland are debt collectors and including Experian, Equifax and Trans Union.

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identity of the collector and magnify the impact of their collection actions aimed at the consumer. single business enterprise and operate so as to use the identities to confuse consumers as to the MRC and Midland operate a debt collection operation utilizing various identities as a

Prior to November 26, 2012, Equable filed a lawsuit against plaintiff in Louisiana state court and the suit was dismissed with prejudice in a "take nothing" dismissal terminating all claims by Equable against plaintiff.

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same, exact contested collection account, #44793*** [iruncated], which had been the subject of the state court lawsuit referenced above and which claims had been dismissed with prejudice, to For unknown reasons and unknown to plaintiff, Equable assigned and transferred the another debt collector, Cavalry

For unknown reasons and unknown to plaintiff, Cavalry accepted the assignment and transfer of the terminated account of Equable and proceeded to commence a credit reporting Page -3.

campaign against plaintiff to the national consumer reporting agencies.

<u>...</u>

Plaintiff was not notified and was unaware of Cavalry's acts until recently.

Upon learning of Cavalry's acts, plaintiff contested the Equable now Cavalry account to

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monthly credit reportings to the national consumer reporting agencies and, each such reporting to each consumer reporting agency, represented an act of debt collection and a false and defamatory communication, made with malice and willful intent to harm plaintiff's credit, property rights For unknown reasons and unknown to plaintiff, Cavalry persisted in a campaign of therein, reputation and standing in the community.

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further, each such reporting to each consumer reporting agency, represented a false communication about the existence of, nature of, sum of, status and all other aspects of the alleged debt collection account.

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postage applied and those letters were not returned undelivered and are presumed to have been agencies and to Equable as well. That letter was dated November 26, 2012 and was properly addressed and mailed to each addressed party and deposited into the U.S. mails with proper Following the dismissal of the aforementioned Equable state court lawsuit, plaintiff, received by the addressees. As further proof of receipt, the addressees communicated with through counsel, lodged a formal, written dispute to all of the national consumer reporting plaintiff and/or counsel acknowledging receipt.

and that the account claimed by Equable [now Cavalry] was not plaintiff's did pleadings made by plaintiff in the dismissed Equable state court lawsuit, that plaintiff did not The November 26, 2012, explained to the consumer reporting agencies and Equable, as account and that Equable was wrongly pursuing plaintiff in credit reportings and the dismissed owe Equable anything collection lawsuit. Pursuant to 15 U.S.C. 1681i[a] and 1681s-2[b], each of the consumer reporting agencies OSCAR/credit reporting dispute notification mechanism established by the consumer reporting communicated with Equable and provided Equable with the same dispute information as was contained in the November 26, 2012, letter which was, of course, copied to Equable directly well. Hence, Equable received the dispute from plaintiff directly as well as through the and reinvestigation functions with their respective furnishers/users/subscriber such as Equable and the other defendants herein. agencies to perform notice

state court and the suit was dismissed without prejudice in a "take nothing" dismissal terminating Prior to November 26, 2012, Midland/MRC filed a lawsuit against plaintiff in Louisiana all claims by Midland/MRC against plaintiff

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an open collection account, #854702*** [truncated], against plaintiff despite receipt of multiple For unknown reasons and unknown to plaintiff, Midland/MRC has persisted to maintain disputes advising Midland/MRC that the subject collection account and alleged underlying debt does not pertain to plaintiff and is not plaintiff's account or debt.

proceeded to commence a credit reporting campaign against plaintiff to the national consumer For unknown reasons and unknown to plaintiff, following 2012, Midland/MRC reporting agencies,

activities, prior [2012 and before] credit reportings and dismissed its baseless collection lawsuit. Plaintiff was not notified and was unaware of Midland's/MRC's acts, after 2012, until recently. Plaintiff was reasonably led to believe that Midland/MRC terminated its collection

Upon learning of Midland's/MRC's acts, plaintiff contested the Midland/MRC account

For unknown reasons and unknown to plaintiff, Midland/MRC has persisted in a

campaign of monthly credit reportings, after 2012, to the national consumer reporting agencies

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a false status and all other aspects of the Further, each such reporting to each consumer reporting agency, represented communication about the existence of, nature of, sum of, alleged debt collection account.

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have been received by the addressees. As further proof of receipt, the addressees communicated with proper postage applied and those letters were not returned undelivered and are presumed was properly addressed and mailed to each addressed party and deposited into the U.S. mails reporting agencies and to Midland/MRC as well. That letter was dated November 26, 2012 plaintiff, through counsel, lodged a formal, written dispute to all of the national consumer Following the dismissal of the aforementioned Midland/MRC state court lawsuit, with plaintiff and/or counsel acknowledging receipt.

27

Midland/MRC was not plaintiff's account and that Midland/MRC was wrongly pursuing plaintiff as did pleadings made by plaintiff in the dismissed Midland/MRC state court lawsuit, that plaintiff did not owe Midland/MRC anything and that the account claimed by The November 26, 2012, explained to the consumer reporting agencies and and the dismissed collection lawsuit. in credit reportings Midland/MRC,

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with their respective furnishers/users/subscriber such as Midland/MRC and the other defendants Pursuant to 15 U.S.C. 1681i[a] and 1681s-2[b], each of the consumer reporting agencies established by the consumer reporting agencies to perform notice and reinvestigation functions information as was contained in the November 26, 2012, letter which was, of course, copied Midland/MRC directly as well. Hence, Midland/MRC received the dispute from plaintiff directly as well as through the E-OSCAR/credit reporting dispute notification mechanism communicated with Midland/MRC and provided Midland/MRC with the same dispute

herein.

Equable and Midland/MRC, plaintiff was not notified, aware nor could he have known under the formal disputes through the consumer reporting agencies' respective reinvestigation and dispute consumer reporting agencies to Equable and Midland/MRC, and the failed reinvestigations by circumstances, that those defendants had violated their duties to conduct reasonable, proper, timely and complete reinvestigations and to report accurate information in respond to those Despite the properly lodged disputes, timely re-transmittal of the disputes by the resolution mechanisms.

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resulted, plaintiff sustained damages and adverse action due to Equable's and Midland's/MRC's As a consequence of the failed reinvestigations and continued false credit reportings that fault and violations.

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in legal pleadings resulting is dismissals of the aforementioned state court lawsuits, as well as the The repeated receipt of disputes from plaintiff, coupled with the same disputes contained conclusion that Equable's and Midland's/MRC's actions and omissions aimed at damaging and harming plaintiff were intentional, malicious, reckless and with willful intent to injure plaintiff. failures to investigate the account and collection files at any time, all show support for the

show each republication, retransmission and reporting of the false and defamatory information by Each of plaintiff's respective consumer reports, from each respective agency, as archived, the defendants about plaintiff and which led to damages and adverse action.

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of inter-related and inter-connected satellites, users, subscribers and scoring partners, represents a by the defendants through their authorized agents, the consumer reporting agencies and their web Each republication, retransmission and reporting of the false and defamatory information separate and distinct tort, violation of both debt collection and credit reporting laws and are separately actionable events.

false and damaging information. Further, each subsequent credit score and other predictive score credit file and each subsequent credit report prepared and published about plaintiff contained the agencies posted the inaccurate credit reporting information from the defendants into plaintiff's defendants. and rating about plaintiff contained information relative to the false reporting by

As an authorized agent of each of the defendants, the national consumer reporting

Defendant Cavalry did nothing to investigate the validity of the Equable account before commencing its damaging and improper campaign against plaintiff and, even since learning plaintiff's disputes and the information plead herein above, Cavalry has persisted in its debt collection and credit reporting acts against plaintiff.

Credit reporting and particularly debt collection credit reporting serves no function but to damage the consumer who is the subject of the reportings.

37.

Credit reporting is an act of debt collection by debt collection agencies.

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Credit reporting is a cheap and effective means of damaging the subject consumer which

Defendants have continued to report the false information and leave the data in plaintiff's credit Plaintiff, individually and through counsel, communicated with defendants on a number of occasions in an effort to obtain resolution and removal of the false information, to no avail. is the intended result sought by the defendants, as furnishers. 39,

despite his protestations and continued credit reporting damages.

Plaintiff has sustained adverse action in his efforts to utilize his credit and the negative defendants have been, at least, a "substantial factor" in causing the damages and adverse

Plaintiff suffered stress, embarrassment, inconvenience and related problems due to the

adverse action and his efforts to correct the damages caused to his credit by defendants.

Plaintiff's credit has excellent absent the contested information.

4

and has sustained adverse action based upon credit reports As reflected in the inquiry sections of plaintiff's credit report copies, plaintiff has applied prepared and published by the defendants to those third parties. for credit and other consumer benefits

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The defendants performed perfunctory and essentially useless reinvestigations resulting in the verification of the false reportings and continued placement of the false information in consumer [credit] reports they published about plaintiff.

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The end result was that the same false, derogatory credit reportings persisted and plaintiff continued to suffer damages.

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Plaintiff suffered a variety of damages, including economic and non-economic damages as prayed for herein.

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Defendants are debi collection agencies.

CK V Defendants recklessly, maliciously and/or intentionally, published and disseminated false and inaccurate information concerning Plaintiff with reckless disregard for the truth.

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consumer reputation of Plaintiff and caused severe humiliation, and emotional Defendants' publication of such false and inaccurate information has severely damaged distress and mental anguish.

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and truthfully respond to reinvestigation requests and by further supplying inaccurate and false failing to perform reasonable reinvestigations and failing to reasonably Defendants, Equable and MRC/Midland, violated the Fair Credit Reporting Act, 15 1681s-2[b], by U.S.C.

Page -9.

information.

information and failed to retract, delete and suppress false and inaccurate information about the Defendants, Equable and MRC/Midland, continued to report false and inaccurate plaintiff, as described more fully herein.

COUNTS

COUNT 1 - ALL DEFENDANTS - NEGLIGENCE OR ALTERNATIVELY INTENTIONAL ACTS

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Defendants owed duties of reasonable care to plaintiff.

53.

Defendants failed to exercise reasonable care and prudence in the reporting and collection of the disputed account, each subsequent reporting and re-reporting, the handling and reinvestigation of data about plaintiff, all made the subject of this lawsuit, and which consequently caused damaged plaintiff.

7

Alternatively, defendants recklessly, maliciously and/or intentionally committed various acts and omissions against plaintiff which have caused damages and other harms to plaintiff.

COUNT 2 - ALL DEFENDANTS - DEFAMATION

V

Defendants recklessly, maliciously and/or intentionally, published and disseminated false and inaccurate information concerning Plaintiff with reckless disregard for the truth of the

3.

Defendants' publishing of such false and inaccurate information has severely damaged reputation of Plaintiff and caused severe humiliation, emotional distress and mental anguish to plaintiff.

57.

Defendants were notified of inaccuracies by plaintiff however, the defendants continued to issue and/or publish report(s) to third parties which contained inaccurate information about

Plaintiff,

Defendants have, with willful intent to injure and/or maliciously, defamed Plaintiff.

COUNT 3 - ALL DEFENDANTS - INVASION OF PRIVACY

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Defendants recklessly, maliciously and/or intentionally, published and disseminated false matters asserted and engaged in other debt collection activities and such actions have invaded and inaccurate information concerning Plaintiff with reckless disregard for the truth of the plaintiff's privacy.

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Defendants have, with willful intent to injure and/or maliciously, invaded Plaintiff privacy.

ALL DEFENDANTS - NECLIGENT OR ALTERNATIVELY INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS AND PROPERTY DAMAGE COUNT 4-

61.

such actions have inflicted emotional distress upon plaintiff and caused serious property damages disregard for the truth of the matters asserted and engaged in other debt collection activities and published and disseminated false and inaccurate information concerning Plaintiff with reckless Defendants negligently or, alternatively, recklessly, maliciously and/or intentionally, to his credit, a valued property right.

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distress upon plaintiff and caused serious property damages to his credit, a valued property right. Defendants have, with willful intent to injure and/or maliciously, inflicted emotional

|MRC, MIDLAND AND EQUABLE| - FAIR CREDIT REPORTING ACT, 1681s-2[b] COUNT 5 - DEFENDANTS-FURNISHERS

63

plaintiff disputed the subject accounts and false credit reportings. Each separate notice trigger Further, the consumer reporting agencies advised Equable and MRC/Midland that duties under section 1681s-2[b]. Despite receipt of the same dispute a number of times, Equable and MRC/Midland failed to properly reinvestigate and respond and repeatedly reported the false, derogatory information to the consumer reporting agencies in violation of the Act.

65.

According to the national consumer reporting agency's reports, in each instance, Equable and MRC/Midland continued to falsely report about plaintiff.

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Equable and MRC/Midland likewise willfully, or alternatively, negligently, violated the conduct a reasonable reinvestigation and by failing to supply accurate and truthful information. Fair Credit Reporting Act, 15 U.S.C. 1681s-2[b], multiple times each, by failing to properly

67.

Rather, Equable and MRC/Midland continued to report false and inaccurate information and failed to retract, delete and suppress false and inaccurate information it reported about the plaintiff.

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Equable and MRC/Midland failed to conduct an investigation or reinvestigation with respect to consumer credit data it reported and repeatedly re-reported about plaintiff.

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C Equable and MRC/Midland failed to review all relevant and pertinent information consumer reporting agencies and plaintiff. provided to it by the

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will] damage plaintiff and his ability to enjoy life and utilize the credit rating and reputation Equable and MRC/Midland were well aware that their reportings and activities would property rights he secured by honoring his obligations to all of his creditors.

COUNT 6 - FAIR DEBT COLLECTION PRACTICES AC

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Defendants failed to investigate the existence, basis, status, identity of the alleged debtor and all other aspects of the respective collection accounts and alleged debts as described herein. Defendants reported false information about the alleged consumer debts to the consumer reports about the Plaintiff, which was inaccurate, false, erroneous and misleading despite notice disseminated personal and credit information, to those agencies, for republication in consumer reporting agencies and, month after month, defendants have re-reported and continually from the plaintiff that such information was inaccurate.

7

Defendants have engaged in a wrongful, illegal and harassing debt collection campaign misrepresentation are designed to coerce and extort plaintiff and to further damage plaintiff These deceptive credit and well-being. Harassment and abuse of a consumer violates the FDCPA. designed to coerce and extort monies from plaintiff which are not owed.

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Defendants' false and misleading communications about plaintiff and to plaintiff violate the FDCPA

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Defendants' conduct, as described herein, constitutes unfair practices in debt collection and violates the FDCPA

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Defendants reported information that misrepresented the alleged debt and engaged in debt multiple occasions. These strict liability violations by the defendants were not made by the collection activities which violated the FDCPA willfully, or alternatively, negligently, on defendants in good faith or due to any bona fide error[s].

ADDITIONAL ALLEGATIONS

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count, have proximately caused a wide variety of damages to plaintiff including but not limited to credit denials, costs and time of repairing their credit, pain and suffering, emotional distress, mental anguish, fear of personal and financial safety and security, and further embarrassment, inconvenience, lost economic opportunities, loss of incidental time, frustration, awards of punitive/exemplary damages, attorneys' fees, litigation expenses, expert witness fees, The above and foregoing actions, inactions and fault of defendants, as to each and every out-of-pocket expenses,

Defendants' false credit reporting about plaintiff have been a substantial factor in causing credit denials and other damages.

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Credit Reporting Act, the Fair Debt Collection Practices Act, and other laws and are thereby Defendants have negligently and/or willfully violated various provisions of the Fair liable unto plaintiff.

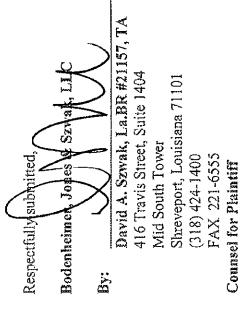
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damages awarded in this case, as well as other demands and claims asserted herein including, but not limited to, out-of-pocket expenses, credit denials, costs and time of repairing his credit, pain assessments proper by law and any and all other applicable federal and state laws, together with time, frustration, emotional distress, mental anguish, fear of personal and financial safety and and suffering, embarrassment, inconvenience, lost economic opportunities, loss of incidental security, attorneys' fees, and court costs, litigation expenses, expert witness fees, and other Defendants are liable unto plaintiff for all actual, statutory, exemplary and punitive legal interest thereon from date of judicial demand until paid. WHEREFORE PLAINTIFF JESSE JAMES PRAYS that after all due proceedings be had there be judgment herein in favor of Plaintiff and against Defendants, as follows:

- statutory damages, out-of-pocket expenses, credit denials, costs and time PERFORMANCEONE FINANCIAL, INC. F/K/A ENCORE CAPITAL attorneys' fees, and court costs, litigation expenses, expert witness fees, ointly and severally, for all reasonable damages sustained by Plaintiff FINANCIAL, LLC, and CAVALRY PORTFÓLIÓ SERVICES, LLC, and other assessments proper by law and any and all other applicable GROUP, INC. D/B/A MIDLAND CREDIT MANAGEMENT, INC., MIDLAND CREDIT MANAGEMENT, INC., EQUABLE ASCENT That there be Judgment in favor of JESSE JAMES and against MRC federal and state laws, together with legal interest thereon from date including but not limited to actual damages, compensatory damages, frustration, emotional distress, mental anguish, fear of personal and inconvenience, lost economic opportunities, loss of incidental time, financial safety and security, and for punitive/exemplary damages, of repairing their oredit, pain and suffering, embarrassment, RECEIVABLES CORP., MIDLAND FUNDING, LLC, judicial demand until paid; and \Box
- That this Honorable Court order the defendants, MRC RECEIVABLES CORP., MIDLAND FUNDING, LLC, PERFORMANCEONE ন

the credit report(s), data emanations, and credit histories of and concerning CAVALRY PORTFOLIO SERVICES, LLC, to reinvestigate and correct FINANCIAL, INC. F/K/A ENCORE CAPITAL GROUP, INC. D/B/A MIDLAND CREDIT MANAGEMENT, INC., MIDLAND CREDIT MANAGEMENT, INC., EQUABLE ASCENT FINANCIAL, LLC, and Plaintiff or any of plaintiff's personal identifiers and cease any and all collection activities made against plaintiff. FURTHER Prays for all such additional, general and equitable relief as may be necessary and proper in the premises.



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PLEASE SERVE

MRC RECEIVABLES CORP.,

To be served with process through its registered agent for service of process: Corporation Service Company, 501 Louisiana Ave., Baton Rouge, Louisiana 70802; and

MIDLAND FUNDING, LLC,

Corporation Service Company, 501 Louisiana Ave., Baton Rouge, Louisiana 70802; and To be served with process through its registered agent for service of process:

PERFORMANCEONE FINANCIAL, INC. F/K/A ENCORE CAPITAL GROUP, INC. D/B/A MIDLAND CREDIT MANAGEMENT, INC.,

To be served via the Louisiana Long-Arm statute through its registered agent for service of Nick Manardi, 2040 Main Street, Suite 800A, Irvine, California 92614;

PLEASE ISSUE LONG-ARM SERVICE PAPERS TO PLAINTIFF'S COUNSEL TO EFFECT SERVICE:

MIDLAND CREDIT MANAGEMENT, INC.,

Corporation Service Company, 501 Louisiana Ave., Baton Rouge, Louisiana 70802; To be served through its registered agent for service of process:

EQUABLE ASCENT FINANCIAL, LLC,

To be served via the Louisiana Long-Arm statute through its registered agent for service of

President/CEO, EQUABLE ASCENT FINANCIAL, LLC, 160 North Franklin, 3th Floor,

Chicago, Illinois 60606;

President/CEO, EQUABLE ASCENT FINANCIAL, LLC, 1120 West Lake Cook Rd., Suite B, Buffalo Grove, Illinois 60089;

PLEASE ISSUE LONG-ARM SERVICE PAPERS TO PLAINTIFF'S COUNSEL TO EFFECT

and

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* CAVALRY PORTFOLIO SERVICES, LLC,
To be served via the Louisiana Long-Arm statute through its agent for service of process:
President/CEO, CAVALRY PORTFOLIO SERVICES, LLC, 7 Skyline Dr., 3rd Floor,
Hawthorne, New York 10532.

PLEASE ISSUE LONG-ARM SERVICE PAPERS TO PLAINTIFF'S COUNSEL TO EFFECT SERVICE.

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Long-Arm Citation

JAMES, JESSE

RECEIVABLES

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COURT DISTRICT NO. 591172-A STATE OF LOUISIANA PARISH OF CADDO FIRST JUDICIAL DIST

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RTY (30) days

the answer or other
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tt, Louisiana. THIRTY (30) documents, you must file an an of the Clerk of this Court at Street, Room 103, Shreveport, petition *Office* I Texas these after you have received these legal pleadings in the Office Parish Court House, 501 Texas

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petition

838428163CAM8888888878 file an answer be entered not may if you do Ŋ о'n days, If you do not do what the petition asks, or legal pleading within THIRTY (30) day, against you without further notice.

onParish, Caddo foxCourt Citation was issued by the Clerk of March 03, 2016. Thisdate

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are the following: ADMISSIONS OF FACTS *Also

Niso attached are the foll REQUEST FOR ADMISSIONS C INTERROGATORIES REQUEST FOR PRODUCTION C

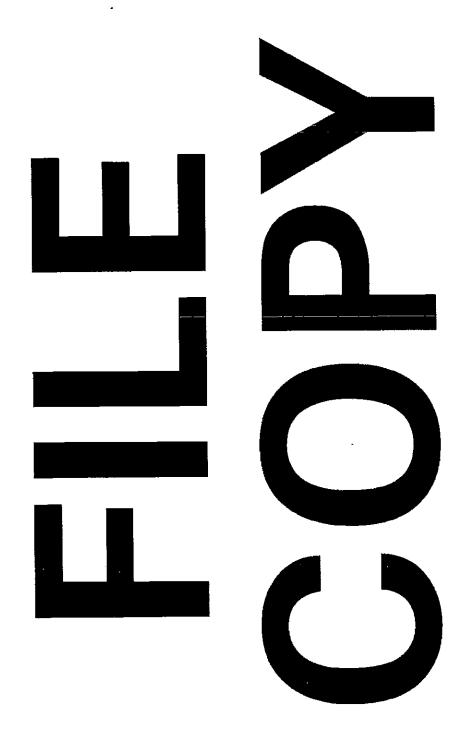
DOCUMENTS OF

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COURT OF COU CLERK CHIEF LOFTIN, SPENCE, GARY MIKE

erkDeputy

SZWAK-4019 Attorney DAVID



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Long-Arm Citation

JAMES, JESSE

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STATE

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NO. 591172-A STATE OF LOUISTANA PARISH OF CADDO FIRST JUDICIAL DIST ETAL CORP RECEIVABLES

COURT

DISTRICT

EQUABLE ASCENT FINANCIAL LLC THRU EQUABLE ASCENT FINANCIAL PRESIDENT/CEO 5 LOUISIANA:

Petition. the ΟĘ copy c sued certified a being sue are u i, Si what you to this Citation tells you what yo SUED BEEN YOU HAVE Attached petition

the Caddo Louisiana. (30) answer THIRTYis, you must file an an elerk of this Court at Room 103, Shreveport, within THIR ust file an OR, documents, you medicate of the Clerk of Street, Room 100 petition what the pereived these the Office the Office (after you have received t legal pleadings in the Of Parish Court House

an answer entered file be en if you do not i judgment may пţ o L days, asks, (thin THIRTY (30) further notice. you do not do what the petition legal pleading within THIRTY (30 against you without or ΙĘ

Caddo Parish, forCourt the Clerk of was issued by 2016. Citation w March 03, *Also This date

COURT OF COU CLERK CHIEF LOFTIN, SPENCE, GARY MIKE

are the following: ADMISSIONS OF FACTS lso attached are REQUEST FOR ADMINITERROGATORIES

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DOCUMENTS

OF

REQUEST FOR PRODUCTION

Clerk Deputy

SZWAK Attorney

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Long-Arm Citation

JAMES, JESSE

VERSUS

ETAL CORP RECEIVABLES

J. LOUISIANA: OF STATETHE

EQUABLE THRU EQU AGENT, I

DISTRICT NO. 591172-A STATE OF LOUISIANA PARISH OF CADDO FIRST JUDICIAL DIST ASCENT FINANCIAL LLC UABLE ASCENT FINANCIAL PRESIDENT/CEO

COURT

The the Petition. ΟĘ for. copysued certified being are Ø įs you Citation to this Citatic tells you what SUED BEEN YOU HAVE Attached petition

days or other the Caddo Louisiana. Caddo or(30) answer THIRIY ß tr Shreveport, s, you must file an Herk of this Court a Room 103, Shreveport within OR, documents, you of the Clerk asks, these documer Street, Texas Office You must EITHER do what after you have received legal pleadings in the Parish Court House, 501

answer entered ממ file рe not may if you do a judgment u o_{r} days, asks, If you do not do what the petition a or legal pleading within THIRTY (30) against you without further notice.

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Caddo Parish,

of Court for

the Clerk

was issued by 2016.

Citation March 03,

This date

are the following: ADMISSIONS OF FACTS so attached are the fol REQUEST FOR ADMISSIONS INTERROGATORIES REQUEST FOR PRODUCTION *A1

COURT OF COUR CLERK CHIEF LOFTIN, SPENCE, GARY MIKE

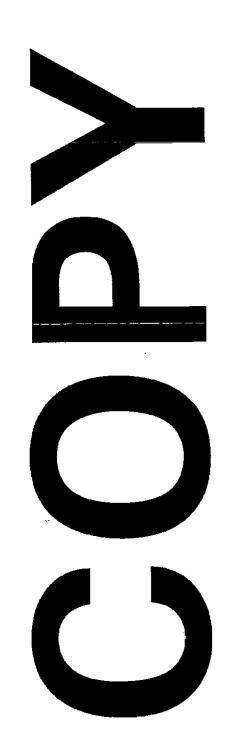
DOCUMENTS OF.

By:

Clerk

Deputy

Attorney SZWAK



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Citation

COURT

DISTRICT

NO. 591172-A STATE OF LOUISLANA PARISH OF CADDO FIRST JUDICIAL DIST

COMPANY

JAMES, JESSE

MIDLAND 5 LOUISIANA: OF. STATE THE

IND CREDIT MANAGEMENT CORPORATION SERVICE (THRU

ETAL

CORP

RECEIVABLES

ROUGE AGENT 501 LOUISIANA AVE BATON ROUGE LA 70802 of the Parish of EAST BATON The

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Petition.

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You must EITHER do what the petition asks, OR, within FIFTEEN (15) days after you have received these documents, you must file an answer or other legal pleadings in the Office of the Clerk of this Court at the Caddo Parish Court House, 501 Texas Street, Room 103, Shreveport, Louisiana. otied copy o certified a being sue are ď yon SUED. his Citation to this Citatic tells you what YOU HAVE Attached petition

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DOCUMENTS

OF COURT DEPUTY CLERK CHIEF LOFTIN, SPENCE, GARY MIKE

Clerk Deputy

By:

SZWAK Attorney Ŋ DAVID

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Long-Arm Citation

COURT

DISTRICT

NO. 591172-A STATE OF LOUISTANA PARISH OF CADDO FIRST JUDICIAL DIST

JAMES, JESSE

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ENCORE CAPITAL GROUP INC DBA MIDLAND CREDIT MANAGEMENT INC THRU NICK MANARDI, AGENT SUED BEEN

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COURT OF COU CLERK CHIEF LOFTIN, SPENCE, GARY MIKE

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Clerk Deputy

Attorney SZWAK べ

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Citation

COURT

DISTRICT

NO. 591172-A STATE OF LOUISIANA PARISH OF CADDO FIRST JUDICIAL DIST

JAMES, JESSE

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MIDIAND 5 OF LOUISIANA: STATE

ND FUNDING LLC CORPORATION SERVICE

THRU CORPORATION SURVE AGENT 501 LOUISIANA AVE BATON ROUGE LA 70802 of the Parish of EAST

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If you do not do what the petition asks, or or legal pleading within FIFTEEN (15) days, against you without further notice. as issued by the Clerk 2016.

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Caddo Parish,

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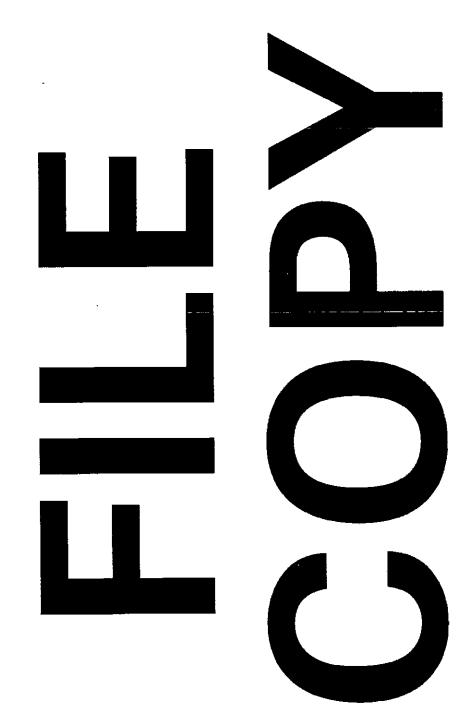
Citation w March 03,

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By:

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SZWAK Attorney DAVID



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Citation

DISTRICT

NO. 591172-A STATE OF LOUISIANA PARISH OF CADDO FIRST JUDICIAL DIST

JAMES, JESSE

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RECEIVABLES CORP 7 CORPORATION SERVICE

AGENT 501 LOUISIANA AVE BATON ROUGE LA 70802 of the Parish of EAST BATON

You must EITHER do what the petition asks, OR, within FIFTEEN (15) days after you have received these documents, you must file an answer or otherwisely pleadings in the Office of the Clerk of this Court at the Caddo parish Court House, 501 Texas Street, Room 103, Shreveport, Louisiana.

If you do not do what the petition asks, or if you do not file an answer in or legal pleading within FIFTEEN (15) days, a judgment may be entered against you without further notice.

This Citation was issued by the Clerk of Court for Caddo Parish, on this was attached are the following:

*Also attached are the following:

REQUEST FOR ADMISSIONS OF FACTS

REQUEST FOR PRODUCTION OF DOCUMENTS

TIMES THE COURT THE PRODUCTION OF DOCUMENTS

REQUEST FOR PRODUCTION OF DOCUMENTS

THE PRODUCTION OF DOCUMENTS

SZWAK-4019 Attorney N, DAVID